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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (SCC)

:

Debtors. : (Jointly Administered)

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CERTIFICATE OF NO OBJECTION
UNDER 28 U.S.C. § 1746 REGARDING THE PLAN
ADMINISTRATOR'S FOUR HUNDRED EIGHTY-FIRST OMNIBUS OBJECTION
TO CLAIMS (NO LIABILITY CLAIMS) SOLELY AS TO CLAIM NUMBER 27141

TO THE HONORABLE SHELLEY C. CHAPMAN UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On October 24, 2014, Lehman Brothers Holdings Inc. (the "<u>Plan</u>

<u>Administrator</u>"), as Plan Administrator under the Modified Third Amended Joint Chapter 11

Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, filed the Four Hundred

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Eighty-First Omnibus Objection to Claims (No Liability Claims) [**ECF No. 46643**] (the "Claims Objection") with the Court for hearing.

- 2. In accordance with the Second Amended Case Management Order, the Plan Administrator established a deadline (the "Response Deadline") for parties to object or file responses to the Claims Objection. The Response Deadline was set for November 24, 2014 at 4:00 p.m. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.
- 3. The Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objection concerning proof of claim number 27141 have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Plan Administrator. Accordingly, the Plan Administrator respectfully requests that the proposed order granting the Claims Objection annexed hereto as Exhibit A be entered in accordance with the procedures described in the Second Amended Case Management Order solely as to proof of claim number 27141.

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I declare that the foregoing is true and correct.

Dated: December 1, 2014 New York, New York

/s/ Garrett A. Fail
Garrett A. Fail

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EXHIBIT A (Proposed Order – ECF No. 46643)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (SCC)

:

Debtors. : (Jointly Administered)

ORDER GRANTING THE PLAN ADMINISTRATOR'S FOUR HUNDRED EIGHTY-FIRST OMNIBUS OBJECTION TO CLAIMS (NO LIABILTY CLAIMS) SOLELY AS TO PROOF OF CLAIM NUMBER 27141

Upon the four hundred eighty-first omnibus objection to claims, dated October 24, 2014 (the "Four Hundred Eighty-First Omnibus Objection to Claims"), of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, seeking to disallow and expunge the No Liability Claims pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [ECF] No. 6664], all as more fully described in the Four Hundred Eighty-First Omnibus Objection to Claims; and due and proper notice of the Four Hundred Eighty-First Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Eighty-First Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Eighty-First Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Eighty-First Omnibus Objection to Claims.

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ORDERED that the relief requested in the Four Hundred Eighty-First Omnibus

Objection to Claims is granted solely as to proof of claim number 27141; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, proof of

claim number 27141 is disallowed and expunged in its entirety with prejudice; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all

matters arising from or related to this Order.

| Dated: | | | , | 2014 |
|--------|-----|-------|-----|------|
| | New | York, | New | York |

UNITED STATES BANKRUPTCY JUDGE